

IN THE UNITED STATES DISTRICT COURT  
Western District of Virginia

CLERK'S OFFICE U.S. DISTRICT COURT  
AT ROANOKE, VA  
FILED

Michael F Urbanski  
District Judge  
(Assigned by Clerk's Office)

OCT 28 2024

LABRA A. AUSTIN, CLERK  
BY: Abbeeson  
DEPUTY CLERK

Joel C. Hoppe  
Mag. Referral Judge  
(Assigned by Clerk's Office)

CIVIL ACTION NO. 7:24-CV-00377  
(Assigned by Clerk's Office)

For use by Inmates filing a Complaint under

**CIVIL RIGHTS ACT, 42 U.S.C. §1983 or BIVENS v. SIX UNKNOWN NAMED AGENTS  
OF FED. BUREAU OF NARCOTICS, 403 U.S.C. §388 (1971)**

Zachary Montgomery Seymour  
Plaintiff Name

10815361

Inmate No.

v.

Southwest Virginia Regional Jail - Haysi Virginia  
Defendant Name & Address

Crystal Large - Nurse Practitioner  
Defendant Name & Address

Lynette Owens  
Defendant Name & Address

Diane Yates  
Defendant Name & Address

Defendant Name & Address

Defendant Name & Address

IF YOU NEED TO ADD MORE DEFENDANTS, USE A SEPARATE SHEET OF PAPER, AND PUT  
NAME AND ADDRESS FOR EACH NAMED DEFENDANT.  
TITLE THE SECOND PAGE "CONTINUED NAMED DEFENDANTS"

\*\*\*\*\*

A. Where are you now? Name and Address of Facility:

Southwest Virginia Regional Jail Authority, Haysi  
Virginia. P.O. Box 535 Haysi VA 24256

B. Where did this action take place?

Southwest VA Regional Jail, Haysi 24256

C. Have you begun an action in state or federal court dealing with the same facts involved in this complaint?

✓ Yes        No

If your answer to A is Yes, answer the following:

1. Court: US District Court Western District "Roanoke"
2. Case Number: Civil Action NO. 7:24-cv-00377

D. Have you filed any grievances regarding the facts of this complaint?

✓ Yes        No

1. If your answer is Yes, indicate the result:

Denied - said no Suboxen in my system

2. If your answer is No, indicate why:

E. Statement of Claim(s): State briefly the facts in this complaint. Describe what action(s) each defendant took in violation of your federal rights and include the relevant dates and places. Do not give any legal arguments or cite any cases or statutes. If necessary, you may attach additional page(s). Please write legibly.

Claim #1 – Supporting Facts – Briefly tell your story without citing cases or law:

2024  
On April 12<sup>th</sup> I was arrested at my Probationers office for failing a  
Urine test. I came to the facility placed in a holding cell.  
On April 13<sup>th</sup> I was given another Urine-Test and was "cont"

Claim #2 – Supporting Facts – Briefly tell your story without citing cases or law:

(Additional Supporting Facts may be placed on a separate paper titled ADDITIONAL SUPPORTING FACTS)

On April 12<sup>th</sup> my wife brought my Prescription of Suboxen  
to the Jail. The nurse LYNETTE gave me a drug test  
said I had no Suboxen in my system. ~~On April 13<sup>th</sup>~~ "cont"

B. Where did this action take place?

Southwest VA Regional Jail, Hayti 24256

C. Have you begun an action in state or federal court dealing with the same facts involved in this complaint?

✓ Yes        No

If your answer to A is Yes, answer the following:

1. Court: U.S. District Court Western District "Roanoke"
2. Case Number: Civil Action NO. 7:24-cv-00377

D. Have you filed any grievances regarding the facts of this complaint?

✓ Yes        No

1. If your answer is Yes, indicate the result:

Denied - said no Suboxen in my system

2. If your answer is No, indicate why:

E. Statement of Claim(s): State briefly the facts in this complaint. Describe what action(s) each defendant took in violation of your federal rights and include the relevant dates and places. **Do not give any legal arguments or cite any cases or statutes.** If necessary, you may attach additional page(s). Please write legibly.

Claim #1 – Supporting Facts – Briefly tell your story without citing cases or law:

2024  
On April 12<sup>th</sup> I was arrested at my Probationers office for failing a  
Urine test. I came to the facility placed in a holding cell.  
On April 13<sup>th</sup> I was given another Urine Test and was "cont"

Claim #2 – Supporting Facts – Briefly tell your story without citing cases or law:

(Additional Supporting Facts may be placed on a separate paper titled ADDITIONAL SUPPORTING FACTS)

On April 12<sup>th</sup> my wife brought my Prescription of Suboxen  
to the Jail. The nurse LYNETTE gave me a drug test  
said I had no Suboxen in my system. I'm assuming "cont"

F. State what relief you seek from the Court. Make no legal arguments and cite no cases or statutes.

150,000 dollars from each defendant  
And put immediately back on my medication

G. If this case goes to trial, do you request a trial by jury?

Yes ☒ No ☐

H. If I am released or transferred, I understand it is my responsibility to immediately notify the court in writing of any change of address after I have been released or transferred or my case may be dismissed.

DATED: Oct 23<sup>rd</sup> 2024 SIGNATURE: Zach Seymour

VERIFICATION:  
I, ZACHARY SEYMOUR, state that I am the plaintiff in this action, and I know the content of the above complaint; that it is true of my own knowledge, except as to those matters that are stated to be based on information and belief, and as to those matters, I believe them to be true. I further state that I believe the factual assertions are sufficient to support a claim of violation of constitutional rights. Further, I verify that I am aware of the provisions set forth in 28 U.S.C. §1915 that prohibit an inmate from filing a civil action or appeal, if the prisoner has, on three or more occasions, while incarcerated brought an action or appeal in federal court that is dismissed on the grounds that it was frivolous, malicious, or failed to state a claim upon which relief may be granted, unless the prisoner is imminent danger of serious physical injury. I understand that if this complaint is dismissed on any of the above grounds, I may be prohibited from filing any future actions without the pre-payment of the filing fees. I declare under penalty of perjury the foregoing to be true and correct.

DATED: Oct 23<sup>rd</sup> 2024 SIGNATURE: Zach Sey

Civil Rights Act - 42 USC  
1983-

Civil Action No.  
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Claim 1 - Supporting Facts,

Continued. Was given a urine test By Nurse Lynette Owens and told I had no Suboxone in my system. Told By Nurse Lynette Owens. I could not continue my Suboxone treatment. That my doctor had me on Dr. STEVEN BAKER. The Urine test that locked me up will show I had Suboxone in my system. From the VIRGINIA Probation office, I begged Nurse LYNETTE OWENS To drug test me again to prove I had SUBOXONE in my system but Nurse LYNETTE OWENS And Nurse DIANE YATES Refused as my medical Request shows, Exhibit sick-call/ Medical - 19,397,971. Response you are being added to the providers list. We must triage as appropriate, please be patient and please do not ~~repea~~ resubmit the same requests and or grievances. I asked Personally Nurse LYNETTE OWENS To Drug test me, She Refused.

Claim 2 - Supporting Facts

Nurse LYNETTE OWENS told Nurse Practitioner CRYSTAL LARGE That I had no Suboxone in my system. And Because of this out right lie I was denied my Medication. This put me into immediate withdraw and pain. It made me suicidal and very depressed

Civil Rights Act 42-usc

1983.

Civil Action NO.

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Claim 2 supporting Facts.

Continued:- This Mat Program is Federally Funded and Paid for by the federal government. The Mat Program is Approved by Congress. Nurse LYNETTE OWENS Took me off my Medication that a doctor had me on. Nurse Lynette OWENS Has overstepped her ability as a Nurse by over riding a doctor. This I believe has violated my 8th and 14th amendments. I am trying desperately to Prove that I was ~~and many others~~ violated. I was put into immediate with draws and made Suicidal by Nurse Lynette Owens Actions.



Zach Seymour 10815361  
P.O. Box 535  
Haysi VA 24256

**RECEIVED**

OCT 28 2024

USDC Clerk's Office  
Mail Room

Clerks Office U.S. District Court  
210 Franklin Road  
SW, Suite 540  
Roanoke VA 24011-2208

24011-220999

KNOXVILLE TN 377  
24 OCT 2024 PM

